



June 22, 2023

VIA ECF

ATTN: Hon. Paul G. Gardephe
Daniel Patrick Moynihan United States Courthouse
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: Re: Torres v. Unibud Restoration Corp. et al.
 Docket No. 22-cv-1191;
 Letter Motion for Extension of Time to File Documents

Dear Judge Gardephe:

I am counsel for the plaintiff, Genesis Torres, in the above referenced matter and I am writing with the consent of the remaining Defendants in this case, pursuant to Your Honor's Individual Rule I. D., to respectfully request an extension of two weeks for Plaintiff's deadline to respond to Defendants' supplemental letter motion with evidentiary exhibits seeking summary judgement (Dkt. #34). This is the first such request for an extension from Plaintiff, however Defendants previously sought a two-week extension to file their supplemental letter, which Your Honor granted. Plaintiff seeks an extension of the deadline from today, 6/22/23 to 7/6/23 to file her supplemental letter response with evidentiary support in opposition to Defendants' letter seeking summary judgement. The reason for this request is that both Plaintiff and one of the

primary witnesses speak only Spanish and can neither read nor fluently understand or speak English, and Plaintiff's firm recently separated with the only Spanish-speaking paralegal/translator in our office who had been assisting on this case for the past year. Accordingly, the logistics of finding a sufficient method of translating between the undersigned, Plaintiff, and her primary supporting witness necessitates this requested extension in order to review and translate Defendants' moving documents, and evidentiary affidavits with Plaintiff and the witness. Our adversaries consent to this request, and no other currently scheduled dates or deadlines will be impacted by this request.

Plaintiff thanks the Court for its time and attention to this matter.

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC
Attorneys for Claimant



Seamus P. Barrett, Esq.

CC to all counsel of record via ECF

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Dated: June 23, 2023